

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

SO ORDERED.

/s/ Alvin Hellerstein
August 30, 2023

LAWRENCE CZARNIONKA, *individually and
on behalf of all others similarly situated,*

Plaintiff,

V.

THE EPOCH TIMES ASSOCIATION, INC.,

Defendant.

Case No.: 1:22-cv-06348-AKH

**UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Plaintiff Lawrence Czarnionka (“Plaintiff”) moves the Court, unopposed, for an extension of time to file a motion for preliminary approval of class action settlement. In support thereof, Plaintiff states the following:

1. Pursuant to the Court’s Order Reopening Case on July 17, 2023, the Parties have a deadline of August 28, 2023 to file a motion for preliminary approval of class action settlement.
2. The Parties have been working diligently and in good faith to memorialize their agreement, including finalizing the settlement papers, but require additional time to finalize and execute.
3. Plaintiff thus requests an additional two weeks until September 11, 2023, to file a motion for preliminary approval of class action settlement.

WHEREFORE, Plaintiff respectfully requests that this Court enter an order extending the deadline within which to file a motion for preliminary approval of class action settlement until September 11, 2023.

Respectfully Submitted,

/s/ Gary M. Klinger

Gary M. Klinger

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 28, 2023 the foregoing document was filed via the Court's ECF system, which will cause a true and correct copy of the same to be served electronically on all ECF-registered counsel of record.

/s/ Gary M. Klinger

Gary M. Klinger

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